

**UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LATISHA WRIGHT,

Plaintiff,

v.

MARRIOTT VACATIONS WORLDWIDE
CORPORATION and OCEAN WATCH
VILLAS OWNERS ASSOCIATION,

Defendants.

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CIVIL ACTION

FILE NO. 1:17-CV-00839-ELR

**MOTION FOR TRANSFER TO THE UNITED STATES DISTRICT COURT OF SOUTH
CAROLINA**

COMES NOW, Plaintiff by and through her counsel of record, and moves the Court as follows:

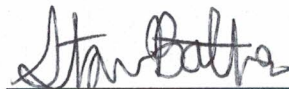
That the Court grant this Motion to Transfer to the United States District Court of South Carolina on the following grounds:

1. Defendants admitted in their Special Answer that they were both South Carolina Companies.
2. If Defendants are both citizens of South Carolina, then the United States District Court of South Carolina would have appropriate jurisdiction over them.
3. "Whenever a civil action is filed in a court as defined in section 610 of this title or an appeal, including a petition for review of administrative action, is noticed for or filed with such a court and that court finds that there is a want of jurisdiction, the court shall, if it is in the interest of justice, transfer such action or appeal to any other such court in which the action or appeal could have been brought at the time it was filed or noticed, and the action or appeal shall proceed as if it had been filed in or noticed for the court to which it is transferred on the date upon which it was actually filed in or noticed for the court from which it is transferred." 28 U.S.C. §1631.

4. Allowing Plaintiff, who is a citizen of Georgia, to pursue compensation for alleged harm caused by Defendants, is in the interest of justice because it would allow the claim to be pursued on its merit, rather than on the issues of Jurisdiction and Statute of Limitations.

It is on these grounds that Plaintiff asks the Court to transfer the case to the United States District Court of South Carolina so that Plaintiff may have her case decided on its merits.

Respectfully submitted this 11th day of May, 2018.



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